

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

PRO TEM PARTNERS, INC.,)	
Plaintiff,)	
)	
v.)	
)	No. 05-11822-RCC
SEMICO RESEARCH)	
CORPORATION, INC.,)	
Defendant.)	

JOINT MOTION TO EXTEND DISCOVERY AND OTHER EVENTS

NOW COME the parties, by and through their attorneys, and hereby move this Honorable Court to extend the discovery and other deadlines by ninety (90) days.

In support of their Motion, the parties state that this case involves a course of dealings which took place over a number of years and involves multiple party and non party witnesses that reside outside of Massachusetts. The parties are diligently pursuing discovery. The parties have also engaged in preliminary settlement discussions and would like to explore settlement before taking depositions which involve witnesses in multiple states.

Accordingly, to allow the parties to conduct discovery in an orderly manner, the parties submit that the discovery and summary judgment deadlines be amended as follows:

1. Fact discovery due by June 31, 2007;
2. Plaintiff to disclose expert by February 1, 2007;
3. Defendant to disclose expert by March 1, 2007;
4. Discovery to be completed by April 30, 2007;
5. Summary Judgment motions due by May 31, 2007;
6. Response to Summary Judgment motions due by July 2, 2007.

WHEREFORE, the parties move this Honorable Court to extend the discovery and other deadlines as set forth herein.

Respectfully submitted,

PRO TEM PARTNERS, INC.,

By its attorneys,

/s/ J. Allen Holland, Jr.

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Respectfully submitted,

SEMICO RESEARCH CORP., INC.

By its attorney,

/s/ Joseph F. Ryan

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